

KOBAYASHI
SUGITA &
GODA
ATTORNEYS • AT • LAW

999 Bishop Street, Suite 2600
Honolulu, Hawaii 96813-4430

Telephone: 808-539-8700
Facsimile: 808-539-8799
E-Mail: ban@ksglaw.com

Bert T. Kobayashi, Jr.*
Kenneth Y. Sugita*
Alan M. Goda*
Dale W. Lee*
Lex R. Smith*
David L. Monroy*
Wendell H. Fuji*
Robert K. Ichikawa*
Janeen-Ann A. Olds*
Clifford K. Higa*
Charles W. Gall*
John F. Lezak*
Larry L. Myers*
Craig K. Shikuma*
Christopher T. Kobayashi*
Ruth K. Oh*
Burt T. Lau*
Ronald T. Ogomori*
David B. Tongg*
Bruce A. Nakamura*
Lanson K. Kupau*
Jonathan A. Kobayashi*
Nathan H. Yoshimoto*
*A Law Corporation

Brendan S. Bailey
George Gusman III
Kenneth M. Nakasone
Curtis K. Saiki
Jesse W. Schiel
Duane C. Seabolt
Joseph A. Stewart
Ann C. Teranishi
Robert A. Ueoka
Thomas H. Yee

October 27, 2005

The Honorable Public Utilities Commission
of the State of Hawaii
Kekuanao'a Building, First Floor
465 S. King Street
Honolulu, Hawaii 96813

Re: Request for Extension for Shell Oil Company to respond to
Order No. 22056 entered in Docket No. 05-0002

To the Honorable Public Utilities Commission of the State of Hawaii:

By this letter, Shell Oil Company ("Shell") respectfully requests that the Public Utilities Commission of the State of Hawaii ("Commission") enlarge the time for Shell to submit the information requested by the Commission by way of Order No. 22056 entered in Docket No. 05-0002. Shell makes this request pursuant to HAR § 6-61-23(a)(1) and submits that good cause exists to grant this request.

As this Commission is aware, by way of Order No. 22056, it ordered that:

[E]ach of the Parties submit by November 1, 2005: (1) a marketing margin proposal further refining the class of trade approach suggested by ICF Consulting, or any [sic] another more appropriate marketing margin proposal based on suitable benchmarks consistent with HRS Chapter 486H; and (2) a proposal to adjust the HRS § 486H-13 factors to include the addition of ethanol blending requirements, which will take effect on or about April 2006. The Parties may submit joint proposals or they may file individual proposal. Each Party should also include all data and information necessary to support its proposal. The commission may review any and all of the other factors or procedures for determining the maximum pre-tax wholesale price of gasoline as may be deemed appropriate by the commission.

PUBLIC UTILITIES
COMMISSION

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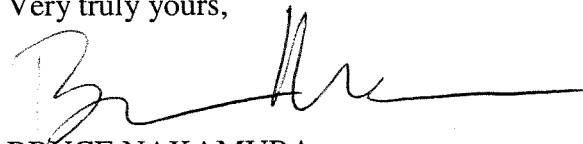
See Order No. 22056 at p. 3.

Given that the Gas Cap law has been in effect for less than 8 weeks, Shell respectfully submits that the basis for its request for an enlargement of time to respond to the information requested in Order No. 22056 ("Information") is that the timing of said request is premature insofar as there has not been a sufficient amount of time to properly study and analyze the effects and impacts of the Gas Cap law as it relates to requested information in Order No. 22056. Specifically with regard to the Commission's request for new proposals relating to ethanol, Shell notes that it is still seeking to ascertain basic plans for sourcing, transportation, storing, and expensing said material to comply with the upcoming ethanol law, and Shell submits that it is currently not in a position to have robust, substantive discussions regarding potential adjustments to the Gas Cap law to accommodate expected future ethanol impacts. Because of the timing of things, Shell requires additional time to properly prepare a meaningful response to the Commission's current request.

While Shell respectfully believes that the Commission would be better served to defer this course of action to a later time when the parties will have more data to work with in preparing their substantive responses, by way of this letter, Shell is requesting an initial extension of 30-days to respond to Order No. 22056.¹ During this extension period, Shell will use its best efforts to adhere to the Commission's requirements and provide a meaningful response to the Information requested in Order No. 22056. Shell also requests that the Commission defer any action set forth in Order no. 22056 until all parties to the proceeding have submitted their responses to the Commission.

In view of all of the above, Shell respectfully submits that good cause exists to grant the relief requested herein.

Very truly yours,



BRUCE NAKAMURA

for

KOBAYASHI, SUGITA & GODA

Attorneys for SHELL OIL COMPANY

cc: Kevin Katsura, Esq., Commission Counsel
Craig Nakanishi, Esq., Tesoro Counsel
Michael Lau, Esq., Chevron Counsel
Mark Rousseau, Esq., Jobbers Counsel
Jon Itomura, Esq., Consumer Advocate Counsel

¹Shell specifically notes that nothing in this letter shall be construed to be a waiver of any of the rights, claims, or arguments Shell has, and will continue to pursue in its present ongoing appeals of Commission Decision & Order No. 21952 and Order No. 21994.